

BRUCE A. BLAKEMAN  
County Executive



THOMAS A. ADAMS  
County Attorney

COUNTY OF NASSAU  
OFFICE OF THE COUNTY ATTORNEY

March 11, 2024

**VIA ECF**

Hon. Judge Nusrat J. Choudhury  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Bruce A. Blakeman et al., v. Letitia James et al.*  
Case No. 24-CV-01655 (NJC)(LGD)

Dear Hon. Judge Choudhury:

The Office of the Nassau County Attorney represents Plaintiffs Bruce A. Blakeman and County of Nassau in the above-referenced case. Plaintiffs submit this letter in accordance with the Court's Individual Rules, enclosing herewith a copy of the proposed Temporary Restraining Order ("TRO").

Plaintiffs further submit this letter to inform the Court that we have notified Defendants of the application for a TRO by letter, which was personally served at the State of New York Attorney General's Office in New York City on March 7, 2024 (please see filing No. 12 on ECF). Additionally and pursuant to the Court's directive, Plaintiffs personally served Defendants with the Order to Show Cause, Declaration, Affidavit of County Executive Bruce Blakeman, Memorandum of Law with attached Exhibits on March 11, 2024 at 11:15 AM at 200 Old Country Road, Suite 240, Mineola, New York 11501 (please see filing No. 14 on ECF).

The undersigned has also spoken with Helena Lynch, Esq., who represents the Defendants in this action. The Defendants indicated that they do not consent to the temporary restraining order. Although Plaintiffs were prepared to consult with Defendants to find a mutually agreeable date for the Court to hear this application, we received notice of the in-person conference scheduled for tomorrow, March 12, 2024, and will be in attendance.

Thank you for your consideration.

Respectfully submitted,

*Victoria LaGreca*

Victoria LaGreca  
Deputy County Attorney  
Office of the Nassau County Attorney  
516-571-5775

Cc:

Helena Lynch, Esq.  
NYS Office of The Attorney General  
200 Old Country Road  
Suite 240  
Mineola, NY 11501  
516-248-3312

Joseph E. Macy, Esq.  
Berkman, Henoch, Peterson & Peddy, P.C.  
Attorneys for Plaintiffs Marc Mullen and Jeanine Mullen  
100 Garden City Plaza  
Garden City, New York 11530  
516-222-6200

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

---

BRUCE A. BLAKEMAN, in his capacity as County Executive of the County of Nassau, COUNTY OF NASSAU, MARC MULLEN as parent and natural guardian of K.E.M., an infant under the age of eighteen years, and JEANINE MULLEN, as parent and natural guardians of K.E.M., an infant under the age of eighteen years,

Plaintiffs,

-against-

LETITIA JAMES, as Attorney General of the State of New York, STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL, and STATE OF NEW YORK,

Defendants.

---

Case No. 2:24-cv-01655

**PROPOSED TEMPORARY  
RESTRAINING ORDER**

Upon the affidavit(s) of Bruce A. Blakeman, sworn to on March 7, 2024, the exhibits annexed to the Declaration of Victoria LaGreca, Esq. dated March 7, 2024, and upon the Memorandum of Law in this action, the Defendants, and any persons/entities acting in concert with them, are hereby:

- (a) preliminarily enjoined from taking further legal action preventing the implementation and enforcement of County Executive Order Number 2-2024 issued by Nassau County Executive Bruce A. Blakeman on February 22, 2024 until such time that this matter is heard and a decision is rendered by this Court in an effort to maintain the status quo;
- (b) temporarily restrained and enjoined from initiating any legal proceedings and/or actions against County Executive Bruce A. Blakeman, the County of Nassau, its agencies, departments and/or employees, related to County Executive Order Number 2-2024 until such time that this matter is heard and a decision is rendered by this Court

in an effort to maintain the status quo; and

- (c) preliminarily enjoined from obtaining any and all documents produced or maintained by our office, constituting records supporting the issuance of Executive Order 2-2024 until such time that this matter is heard and a decision is rendered by this Court in an effort to maintain the status quo.

DATED: Central Islip, New York  
March \_\_\_\_\_, 2024

**SO ORDERED:**

---

Honorable Nusrat J. Choudhury  
United States District Judge